

The Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STANLEY PACE, an individual

Plaintiff,

v.

AMBI SERVICOS DE INTERNET LTDA., a
Brazil corporation,

Defendant.

Case No. 2:18-cv-01172-TSZ

**STIPULATION AND JOINT MOTION
FOR ENTRY OF JUDGMENT**

NOTE ON MOTION CALENDAR:
June 26, 2019

Plaintiff Stanley Pace and Defendant Ambi Servicos de Internet Ltda., by and through their undersigned counsel of record, hereby stipulate to the entry of judgment in this action providing the following relief:

1. In accordance with 15 U.S.C. § 1114(2)(D)(v), a declaratory judgment under Rule 57 of the Federal Rules of Civil Procedure and 28 U.S.C. § 2201 that Pace's registration and use of the domain name SUAMUSICA.COM ("Domain Name") did not violate Defendant's rights under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), or otherwise under the Lanham Act, 15 U.S.C. § 1051 *et seq.*
2. Further in accordance with 15 U.S.C. § 1114(2)(D)(v), an order directing the registrar, Epik.com, to take all action necessary to enable the Domain Name; to

reactivate the Domain Name; to discontinue any suspension of the Domain Name;
and to refrain from transferring the Domain Name from Pace to Ambi Servicios;

3. Plaintiff's remaining claims shall be dismissed without prejudice; and

4. Each party shall bear its own costs.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: June 26, 2019

Respectfully Submitted,

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